

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

CENTRIPETAL NETWORKS, LLC,)
Plaintiff,)
v.) No. 2:18-cv-00094-EWH-LRL
CISCO SYSTEMS, INC.,)
Defendant.)
_____)

**UNOPPOSED MOTION AND MEMORANDUM IN SUPPORT OF MOTION TO
STAY PAYMENT AND EXECUTION OF BILL OF COSTS UNTIL APPEAL
FINALIZED**

Plaintiff, Centripetal Networks, LLC (“Centripetal”), by counsel, moves this Court for order staying the execution of the Bill of Costs awarded (“Award of Bill of Costs”) by this Court on May 27, 2025 (ECF No. 819) until the conclusion of the pending appeals in this matter. In support of this motion, Centripetal states as follows:

1. This matter is on its second and third appeal. After remand and reassignment of the first appeal, this matter proceeded before this Court pursuant to Rule 63 of the Federal Rules of Civil Procedure. The Court entered judgment (“Judgment”) against Centripetal on December 12, 2024 (ECF No. 781). Thereafter, Centripetal perfected its appeal of the Judgment and that appeal is pending before the United States Court of Appeals for the Federal Circuit (“Appeal”) (ECF Nos. 816-818). The parties have briefed the Appeal and are awaiting the scheduling of oral argument.

2. After entry of the Judgment, the Defendant filed its Bill of Costs (ECF No. 799). The parties briefed the issues related to the Bill of Costs and, this Court entered an order on May 27, 2025 granting in part and denying in part the Bill of Costs in the Award of Bill of Costs.

3. In addition, the Court bifurcated one of the Asserted Patents from the case pending resolution of an *Inter Parties* Review (“IPR”) of that particular patent. The IPR concluded and the final written decision has been appealed to the Federal Circuit. The oral argument was held on February 6, 2025 for that appeal.

3. Given the Appeals pending before the Federal Circuit, Centripetal requests that the Court stay the execution of the Award of Bill of Costs until the Appeals are concluded. The parties agree that no security need be posted to secure the Award of Bill of Costs.

4. Centripetal’s requested stay will not cause delay, is not prejudicial to any party, and is not contrary to the interests of justice. Defendant does not oppose the relief requested. A proposed order granting the requested relief is attached as attached as **Exhibit 1**.

5. Because there is no objection, Centripetal does not request a hearing unless the Court would deem one helpful.

WHEREFORE, Centripetal respectfully requests that the Court enter the attached order staying the execution of the Award of Bill of Costs until the Appeals in this matter are concluded.

Dated: July 8, 2025

Respectfully submitted,

/s/ Stephen E. Noona
Stephen E. Noona (VSB No. 25367)
KAUFMAN & CANOLES, P.C.
150 W. Main Street, Suite 2100
Norfolk, VA 23510-1665
Telephone: (757) 624-3239
Facsimile: (888) 360-9092
senoona@kaufcan.com

Paul J. Andre (*pro hac vice*)
(Paul.Andre@hsfkramer.com)
Lisa Kobialka (*pro hac vice*)
(Lisa.Kobialka@hsfkramer.com)

James Hannah (*pro hac vice*)
(James.Hannah@hsfkramer.com)
Kristopher Kastens (*pro hac vice*)
(Kris.Kastens@hsfkramer.com)
Michael H. Lee (*pro hac vice*)
(Michael.Lee@hsfkramer.com)
Aakash Jariwala (*pro hac vice*)
(Aakash.Jariwala@hsfkramer.com)
Melissa T. G. Brenner (*pro hac vice*)
(Missy.Brenner@hsfkramer.com)
HERBERT SMITH FREEHILLS KRAMER (US) LLP
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065
Telephone: (650) 752-1700
Facsimile: (650) 752-1800

Aaron M. Frankel (*pro hac vice*)
(Aaron.Frankel@hsfkramer.com)
Jonathan Caplan (*pro hac vice*)
(Jonathan.Caplan@hsfkramer.com)
Eileen Patt (*pro hac vice*)
(Eileen.Patt@hsfkramer.com)
Cristina L. Martinez (*pro hac vice*)
(Cristina.L.Martinez@hsfkramer.com)
Jeffrey Eng (*pro hac vice*)
(Jeffrey.Eng@hsfkramer.com)
HERBERT SMITH FREEHILLS KRAMER (US) LLP
1177 Avenue of the Americas
New York, NY 10036
Telephone: (212) 715-9100
Facsimile: (212) 715-8314

*Attorneys for Plaintiff
Centripetal Networks, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send notification of electronic filing to all counsel of record.

/s/ Stephen E. Noona
Stephen E. Noona
Virginia State Bar No. 25367
KAUFMAN & CANOLES, P.C.
150 West Main Street, Suite 2100
Norfolk, VA 23510
Telephone: (757) 624-3239
Facsimile: (888) 360-9092
senoona@kaufcan.com